

William Patmon

From: Armstrong, Kristopher [karmstrong@bakerlaw.com]
Sent: Wednesday, December 14, 2011 9:16 PM
To: William Patmon
Subject: RE: Need additional documents for deposition -- see prior emails.

Bill,

As best as I can tell, you have asked for (1) any additional documents from Dr. Borders' file, and (2) any severance agreements with Dr. Border and Amanda Bowers. As stated before, I believe that Dr. Borders' entire file has been produced. I have asked again if there is anything else, and if I hear that there is, I will forward it to you.

Regarding your request for any severance agreements with other employees, any such documents (if they existed, which I cannot verify at this late hour), would be irrelevant to the claims and defenses in Dr. Nayyar's lawsuit. As such, Defendants would object to producing any such documents.

Kris

-----Original Message-----

From: William Patmon [mailto:Wpatmon@patmonlaw.com]
Sent: Wednesday, December 14, 2011 5:43 PM
To: Armstrong, Kristopher
Subject: Need additional documents for deposition -- see prior emails.

The documents are needed in order to depose Weiss and oppose any motion filed by Mount Carmel.

Sent from my iPad

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